

MICHAEL J. HADDAD (State Bar No. 189114)  
JULIA SHERWIN (State Bar No. 189268)  
T. KENNEDY HELM (State Bar No. 282319)  
MAYA SORENSEN (State Bar No. 250722)  
HADDAD & SHERWIN LLP  
505 Seventeenth Street  
Oakland, California 94612  
Telephone: (510) 452-5500  
Facsimile: (510) 452-5510

Atorneys for Plaintiffs  
KAYLEIGH SLUSHER, Dec., JASON SLUSHER,  
ROBIN SLUSHER and BENNY SLUSHER

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

KAYLEIGH SLUSHER, Deceased, THROUGH  
HER SUCCESSOR IN INTEREST JASON  
SLUSHER; JASON SLUSHER, Individually;  
ROBIN SLUSHER, Individually; and BENNY  
SLUSHER, Individually,

Plaintiffs,  
vs.

CITY OF NAPA, a public entity; NAPA POLICE  
OFFICER GARRETT WADE, Individually;  
NAPA POLICE OFFICER DEGUILIO,  
Individually; NAPA CHIEF OF POLICE  
RICHARD MELTON, Individually and in his  
Official Capacity; COUNTY OF NAPA, a public  
entity; NAPA COUNTY CHILD WELFARE  
SERVICES SOCIAL WORKER NANCY  
LEFLER, Individually; NAPA COUNTY CHILD  
WELFARE SERVICES WORKER ROCIO  
DIAZ-LARA, Individually; and DOES 1-50,  
Jointly and Severally

Defendants.

) Case No. 4:15-cv-02394-SBA (JCS)

) Hon. Saundra Brown Armstrong

) Hon. Joseph C. Spero

)  
(~~PROPOSED~~) ORDER FOR  
EXCHANGE OF DOCUMENTS  
AND INFORMATION  
PURSUANT TO PROTECTIVE  
ORDER

1       The Court, having reviewed Plaintiffs' Notice Re: Denial of County Defendants' Motion to  
2 Stay, the Court's Order Denying County Defendants' Motion to Stay (Dkt. 99), and the record in  
3 this matter, and good cause appearing, this Court hereby Orders as follows:

4

5       1)      All parties shall receive a complete copy of all Coroner's, Autopsy, and Toxicology reports;  
6 complete Coroner's Office investigative files related to the death of Kayleigh Slusher; all  
7 photographs of any kind related to the death of Kayleigh Slusher, including but not limited to all  
8 autopsy photographs; all recordings, whether by audio or video, related to the death of Kayleigh  
9 Slusher; and all statements, interviews, notes, correspondence, or records of any kind related to the  
10 death of Kayleigh Slusher.

11      2)      The documents and information to be produced specifically includes all records and  
12 information in the possession, custody, or control of A) the City of Napa and its police department,  
13 concerning Kayleigh Slusher's death and the claims and defenses made in this case, regardless of  
14 the source; B) the City of Napa and its police department, concerning all calls for service to  
15 Kayleigh Slusher's apartment (2060 Wilkins Avenue, Apt. 7, Napa, CA) prior to February 3, 2014,  
16 regardless of the source; C) Napa County concerning Kayleigh Slusher's death and the claims and  
17 defenses made in this case, regardless of the source; and D) Plaintiffs, concerning Kayleigh  
18 Slusher's death and the claims and defenses made in this case, regardless of the source.

19      3)      No party waives any legal right to assert appropriate privileges, with a privilege log.

20      4)      All documents and information produced pursuant to this Order shall be deemed  
21 confidential and subject to the Protective Order in this matter. (Dkt. 33).

22      5)      Should any party need to file any of the documents and information produced pursuant to  
23 this Order in court during the pendency of criminal proceedings against Sara Krueger or Ryan  
24 Warner, that party shall file the documents and information under seal.

25      6)      Plaintiffs and the Napa County Defendants shall produce the documents and information  
26 within ten days of this Court's Order. The City of Napa Defendants shall produce the documents  
27 and information no later than August 15, 2016, given their counsel's travel outside the country.

28

1

2 FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

3

4

5 Dated: 7/29/16

HONORABLE JOSEPH C. SPERO



6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28